

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RONNIE JONES, ET AL.,

Plaintiffs,

V.

CITY OF BOSTON, ET AL.,

Defendants.

CIVIL ACTION
NO. 05-11832-GAO

PLAINTIFFS' MOTION TO FILE DOCUMENT UNDER SEAL

Pursuant to Federal Rule of Civil Procedure 26(c) and Local Rule 7.2, Plaintiffs request that the Court allow it to file Exhibit A of this Motion in hard copy for the Court's eyes only, that Exhibit A be sealed, and that no copy of Exhibit A be placed in the electronic docket or maintained by the Court Clerk's office, unless and until Exhibit A is produced in open Court. As grounds for this Motion, Plaintiffs state as follows:

1. On October 24, 2007, the Parties argued several motions before this Court. These motions included Plaintiffs Motion to Compel Defendants to Produce Positive Hair Test Results and E-mails Responsive to Plaintiffs' Document Requests, dated June 11, 2007.
2. On October 25, 2007, this Court requested that the parties submit "the two spreadsheets produced by defendants, dated January 2006 and January 10, 2007 respectively, summarizing information related to those officers who tested positive for drugs under the hair test." October 25, 2007 Order, ¶ 2.
3. Exhibit A to this motion is a copy of the January 10, 2007 spreadsheet of positive test results requested by this Court in the October 25, 2007 Order.

4. Plaintiffs move to seal Exhibit A as it references specific non-party police officers (or former police officers), and public filing of this document would be invasive of these individuals' privacy.
5. Plaintiffs and Defendants conferred and Defendants confirmed that they did not produce a spreadsheet of positive test results to Plaintiffs dated January 2006.

Dated: November 2, 2007

Respectfully submitted,

Ronnie Jones, Richard Beckers, Walter Washington, William Earl Bridgeforth, Shawn N. Harris, Eugene Wade George C. Downing, Jr., Clararise Bristow, and the Massachusetts Association of Minority Law Enforcement Officers,

By their attorneys,

/s/ Raquel J. Webster

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CERTIFICATE OF SERVICE

I hereby certify that, on November 2, 2007, a true copy of the above document was served upon the attorney of record for each other party electronically via the ECF/CM system, and that a true paper copy of Exhibit A referenced herein was filed with the Court in hard copy with a copy to Plaintiffs' counsel by hand-delivery on November 2, 2007.

/s/ Raquel J. Webster